



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

FEB 7 2008

Reply to  
Attn of: OCE-082

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Tom McKinsey, Special Projects  
The Consolidated Borough of Quil Ceda Village  
8802 27<sup>th</sup> Avenue NE  
Tulalip, WA 98271-7433

Re: UIC Application for Authorization by Rule  
Quil Ceda Village Project  
EPA Project # 4-25-5x-00743

Dear Mr. McKinsey:

This is in response to the request by Quil Ceda Village for the following:

1. Five (5) year reauthorization of the Authorization by Rule (ABR) to allow continued operation of nineteen (19) injection wells. The original ABR was granted by EPA on March 17, 2003.
2. Five (5) year Authorization by Rule to construct three (3) additional injection wells for injection of effluent from a pilot wetlands treatment project.

Thank you for submitting the completed inventory information for the facility, including both the existing and proposed Class V Underground Injection Wells.

In summary, your application requests reauthorization of the existing nineteen (19) injection wells for five years at a maximum injection rate of 9,125,000 gallons per month (average of ~300,000 gallons per day) of treated wastewater; and authorization of three (3) additional injection wells related to a pilot wetlands treatment project at a maximum injection rate of 50,000 gallons per day.

EPA has reviewed your application and supporting documentation and found it sufficient to make a determination on your request:

1. Quil Ceda Village will be operating a Class V disposal system under the Underground Injection Control (UIC) Program as defined at 40 CFR 144.6.

2. The injection wells are regulated under UIC program requirements found in 40 CFR Parts 144, 146, and 147, promulgated under Part C of the Safe Drinking Water Act, 42 United States Code Sections 1421 through 1428.
3. 40 CFR Part 144 Subpart G specifically applies to Class V injection wells.

Therefore:

Operation of the wastewater injection system, consisting of the existing nineteen (19) injection wells and the three (3) new injection wells associated with the wetlands treatment pilot project, as described within the Quil Ceda Village's November 16, 2006, UIC application is authorized by rule for five years (to March 17, 2013) pursuant to 40 CFR § 144.24 and 144.84(a). Consistent with the authorization by rule:

1. The Quil Ceda Village Class V disposal system must comply with 40 CFR 144.12(a) which prohibits any underground injection system that may endanger an Underground Source of Drinking Water (USDW);
2. The Quil Ceda Village Class V disposal system is subject to periodic compliance inspections, which may include sampling and analysis of the fluids to be injected to ground through the disposal system;
3. It is expected that the treated effluent injectate from the treatment system will meet the federal drinking water standards; the operator will monitor the effluent to document compliance with those standards;
4. Pursuant to EPA's information gathering authority, as specified in 40 CFR § 144.27 and 40 CFR § 144.83(b):
  - Quil Ceda Village is to report any discharge into the injection wells that exceeds Maximum Contaminant Levels of the Safe Drinking Water Act to the Environmental Protection Agency, Region 10 (EPA) within twenty-four (24) hours of the event;
  - Should any conditions change in the operation of this system to fall outside of the authorization detailed above, EPA is to be notified within seven (7) days;
5. Quil Ceda Village shall ensure that all applicable UIC requirements under the Safe Drinking Water Act, including construction, operation, monitoring, record retention, closure and all other requirements are met; and
6. For the new injection wells, Quil Ceda Village shall submit a final construction completion report (i.e., well logs, as-built drawings, map with location of wells, etc.) prior to initiation of injection.

Please note that under 40 CFR Part 144.12(c), (d), and (e), EPA can require owners or operators of Class V disposal systems currently authorized by rule to apply for a permit, or close

the disposal system under certain circumstances, if EPA determines it is necessary to prevent endangerment to underground sources of drinking water.

EPA reviewed the Quality Assurance Project Plan submitted with the application. While EPA does not formally approve or disapprove of such plans, we do offer the following comments. Overall, the QAPP is technically sound, however, the following clarifications and/or corrections should be implemented:

- Table 2-1 Sample Containers, Preservatives, and Holding Times – An error was noted in the preservation and holding times for Fecal Coliform samples. Please make the following change to your plan: Replace NaOH with Sodium Thiosulfate (if residual chlorine is detected) and change the holding time from 24 hours to 6 hours.
- The laboratory for this project, CCI Analytical, currently has a State Accreditation for monitoring under the Clean Water Act but does not appear on the State's list of Drinking Water Certified labs. To ensure that your system is meeting drinking water standards, a Drinking Water Certified lab should be used.

Finally, a survey of large capacity wastewater drainfields within our region (October 2002) identified the lack of proper operations and maintenance as one of the leading causes for drainfield failures. For that reason, EPA would like to stress the importance of maintaining the equipment in accordance with the manufacturer's final O&M manuals.

All correspondence related to the requirements of this Authorization by Rule, including notifications of changes in operation should be addressed as follows:

US-EPA, Region 10  
Attn: Class V UIC Program  
1200 Sixth Avenue, Suite 900  
M/S OCE-082  
Seattle, WA 98101-3140

Thank you for your time and cooperation in providing the information on your underground injection system to EPA. If you have any questions, please call me at (206) 553-6708.

Sincerely,



Peter Contreras, Manager  
Ground Water Unit



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, Washington 98101

January 2, 2008

Reply To  
Attn Of: **OEA-095**

**MEMORANDUM**

**SUBJECT:** Review of Quality Assurance Project Plan for the Quil Ceda Village Wastewater Treatment Plant Effluent Monitoring Program, The Consolidated Borough of Quil Ceda Village, September, 2006

**FROM:** Donald Matheny, Chemist *DM*  
Environmental Services Unit, Office of Environmental Assessment

**TO:** Kirk Robinson,  
Office of Compliance and Enforcement (OCE-082)

I've completed a review of the above Plan. Overall, the QAPP is technically sound and few errors were noted during the review. The following review comments refer to clarifications and/or corrections that should be implemented. If you have any questions, please call me at (206)553-2599.

**Table 2-1 Sample Containers, Preservatives, and Holding Times**

An error was noted in the preservation of Fecal Coliform. Replace NaOH with Sodium Thiosulfate (if residual chlorine is detected) and change the holding time from 24 hours to 6 hours.

The laboratory for this project, CCI Analytical, currently has a State Accreditation for monitoring under the Clean Water Act but does not appear on the State's list of Drinking Water Certified labs. For UIC compliance monitoring, are they required to use a Drinking Water Certified Lab?